UNITED STATES OF AMERICA.

Plaintiff,

20-CR-098

v.

RAYNARD A. HALL,

Case No. 20-CR [18 U.S.C. §§ 922(g)(1), 924(a)(2) & 924(c); 21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C)

Defendant

#### **INDICTMENT**

#### **COUNT ONE**

#### THE GRAND JURY CHARGES THAT:

1. On or about December 18, 2019, in the State and Eastern District of Wisconsin,

## RAYNARD A. HALL,

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Bersa, model Thunder 380, .380 caliber handgun, bearing serial number B83798.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

# **COUNT TWO**

## THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 18, 2019, in the State and Eastern District of Wisconsin,

## RAYNARD A. HALL

knowingly and intentionally possessed with intent to distribute controlled substances: a mixture and substance containing heroin, a Schedule I controlled substance; and a mixture and substance containing N-phenyl-N- [ 1- (2-phenylethyl ) -4-piperidinyl ] propanamide (commonly known as fentanyl), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C)

# **COUNT THREE**

## THE GRAND JURY FURTHER CHARGES THAT:

On or about December 18, 2019, in the State and Eastern District of Wisconsin,

#### RAYNARD A. HALL

knowingly possessed a firearm in furtherance of the drug trafficking offense charged in Count Two of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

A TRUE BILL:

FOREPERSON

Date: 6.23.2020

MATTHEW D. KRUEGER United States Attorney